

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

CHARLES HAIR,

Plaintiff,

Case No.: 2:22-cv-2500

v.

**BLAZIN WINGS, INC. d/b/a BUFFALO WILD
WINGS GRILL AND BAR,**

Defendant.

NOTICE OF REMOVAL

Without submitting to the jurisdiction of this Court and without waiving any available defenses, including, without limitation, lack of jurisdiction, improper venue, statute of limitations, insufficient process, or insufficient service of process, Defendant Blazin Wings, Inc. d/b/a Buffalo Wild Wings Grill and Bar, by and through undersigned counsel and pursuant to 28 U.S.C. §§ 1332, 1441, and 1446. hereby files this Notice of Removal of the above-described action to the United States District Court for the Western District of Tennessee, Western Division, from the Circuit Court for Shelby County, Tennessee where the action is now pending and states as follows:

1. This cause of action was commenced in the Circuit Court for Shelby County, Tennessee on July 7, 2022 and process was served on the Defendant on July 8, 2022. A copy of Plaintiff's Complaint setting forth the claim for relief upon which the action is based was first received by the defendant on July 8, 2022. Thus, removal is timely filed.

2. The action is a civil action for damages arising out of injuries sustained in a fall at Blazin Wings, Inc.'s Buffalo Wild Wings Grill and Bar premises, and the United States District

Court for the Western District of Tennessee, Western Division, has jurisdiction by reason of the diversity citizenship of the parties.

3. The matter in dispute exceeds \$75,000, exclusive of interests and costs.

4. At the time of the commencement of this action in state court, and since that time, the Plaintiff is a citizen and resident of Shelby County, Tennessee. Defendant Blazin Wings, Inc. d/b/a Buffalo Wild Wings Grill and Bar is a Minnesota corporation, a citizen of Minnesota. Blazin Wings, Inc. d/b/a Buffalo Wild Wings Grill and Bar is not a citizen of the State of Tennessee.

5. A copy of all pleadings and Orders served upon Blazin Wings, Inc. d/b/a Buffalo Wild Wings Grill and Bar is filed with this Notice and attached hereto as Exhibit A.

6. Blazin Wings, Inc. d/b/a Buffalo Wild Wings Grill and Bar will give written notice of the filing of this Notice as required by 28 U.S.C. § 1446(d).

7. A copy of this Notice will be filed with the Clerk of the Circuit Court of Shelby County, Tennessee as required by 28 U.S.C. § 1446(d).

WHEREFORE, Blazin Wings, Inc. d/b/a Buffalo Wild Wings Grill and Bar requests that this action proceed in this Court as an action properly removed to it.

Dated this the 8th day of August, 2022.

Respectfully submitted,

CARR ALLISON

By: /s/ Katherine E. Carr
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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2022, I electronically filed a Notice of Removal with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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Memphis, TN 38117
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CARR ALLISON

BY: : /s/ Katherine E. Carr
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